

EXHIBIT A

[PROPOSED] ANSWER TO COMPLAINT

EXHIBIT A

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*Pro hac vice to be submitted

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JILL STOKKE, an individual, CHRIS
PRUDHOME, MARCHANT FOR
CONGRESS, RODIMER FOR CONGRESS,
an individual,

Plaintiffs,

vs.

SECRETARY OF STATE BARBARA
CEGAVSKE, in her official capacity, and
CLARK COUNTY REGISTRAR OF
VOTERS JOSEPH P. GLORIA, in his official
capacity

Defendants,

Case No.: 2:20-cv-02046-APG-DJA

**[PROPOSED] ANSWER TO
COMPLAINT**

Proposed Intervenors Democratic National Committee and Nevada State Democratic Party, by and through their attorneys, submit the following Answer to Plaintiffs' Complaint. Proposed Intervenors respond to the allegations in the Complaint as follows:

JURISDICTION AND VENUE

1. Paragraph 1 contains mere characterizations, legal contentions, and conclusions to which no response is required.

2. Paragraph 2 contains mere characterizations, legal contentions, and conclusions to which no response is required.

PARTIES

3. Proposed Intervenors are without sufficient information or knowledge with which to form a belief as to the truth or falsity of the allegations contained in Paragraph 3.

4. Proposed Intervenors are without sufficient information or knowledge with which to form a belief as to the truth or falsity of the allegations contained in Paragraph 4.

5. Proposed Intervenors are without sufficient information or knowledge with which to form a belief as to the truth or falsity of the allegations contained in Paragraph 5.

6. Proposed Intervenors are without sufficient information or knowledge with which to form a belief as to the truth or falsity of the allegations contained in Paragraph 6.

7. Proposed Intervenors admit the allegations contained in Paragraph 7.

8. Proposed Intervenors admit the allegations contained in Paragraph 8.

FACTUAL ALLEGATIONS

9. Proposed Intervenors admit the allegations contained in Paragraph 9.

10. Paragraph 10 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations.

11. Proposed Intervenors deny the allegations in Paragraph 11.

12. Proposed Intervenors are without sufficient information or knowledge with which

1 to form a belief as to the truth or falsity of the allegations contained in Paragraph 12.

2 13. Proposed Intervenors are without sufficient information or knowledge with which
3 to form a belief as to the truth or falsity of the allegations contained in Paragraph 13.

4 14. Proposed Intervenors are without sufficient information or knowledge with which
5 to form a belief as to the truth or falsity of the allegations contained in Paragraph 14.

6 15. Proposed Intervenors deny the allegations in Paragraph 15.

7 16. Paragraph 16 contains mere characterizations, legal contentions, and conclusions
8 to which no response is required. To the extent a response is required, Proposed Intervenors deny
9 the allegations.

10 17. Paragraph 17 contains mere characterizations, legal contentions, and conclusions
11 to which no response is required.

12 18. Proposed Intervenors are without sufficient information or knowledge with which
13 to form a belief as to the truth or falsity of the allegations contained in Paragraph 18.

14 **Count I**

15 19. Proposed Intervenors incorporate by reference all of its responses to allegations in
16 the preceding and ensuing paragraphs as if fully set forth herein.

17 20. Paragraph 20 contains mere characterizations, legal contentions, and conclusions
18 to which no response is required.

19 21. Paragraph 21 contains mere characterizations, legal contentions, and conclusions
20 to which no response is required. To the extent a response is required, Proposed Intervenors deny
21 the allegations.

22 22. Paragraph 22 contains mere characterizations, legal contentions, and conclusions
23 to which no response is required. To the extent a response is required, Proposed Intervenors deny
24 the allegations.

25 23. Paragraph 23 contains mere characterizations, legal contentions, and conclusions
26 to which no response is required.

Count II

24. Proposed Intervenor incorporate by reference all of its allegations in the preceding and ensuing paragraphs as if fully set forth herein.

25. Paragraph 25 contains mere characterizations, legal contentions, and conclusions to which no response is required.

26. Paragraph 26 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations.

27. Paragraph 27 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations.

28. Paragraph 28 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations.

Count III

29. Proposed Intervenor incorporate by reference all of its allegations in the preceding and ensuing paragraphs as if fully set forth herein.

30. Paragraph 30 contains mere characterizations, legal contentions, and conclusions to which no response is required. To the extent a response is required, Proposed Intervenor deny the allegations.

AFFIRMATIVE DEFENSES

Proposed Intervenor set forth their affirmative defenses without assuming the burden of proving any fact, issue, or element of a cause of action where such burden properly belongs to Plaintiffs. Moreover, nothing stated here is intended or shall be construed as an admission that any particular issue or subject matter is relevant to the allegations in the complaint. Proposed Intervenor reserve the right to amend or supplement their affirmative defenses as additional facts concerning defenses become known.

As separate and distinct affirmative defenses, Proposed Intervenor alleges as follows:

Plaintiffs fail to state a claim on which relief can be granted.

Plaintiffs lack standing.

Plaintiffs claims are barred by collateral estoppel.

PRAYER FOR RELIEF

WHEREFORE, Proposed Intervenor respectfully requests that this Court:

A. Deny that Plaintiffs are entitled to any relief;

B. Dismiss the complaint in its entirety, with prejudice; and

C. Grant such other and further relief as the Court may deem just and proper.

DATED this 6th day of November, 2020.

**WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP**

By: /s/ Bradley Schrager

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**Pro hac vice applications forthcoming*